

IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION

UNITED STATES OF AMERICA

v.

KHOSROV SHAPOORIAN,

Defendant.

Case No. 1:23-mj-90

Case No. 1:23-po-30

MOTION FOR DISMISSAL

Pursuant to Federal Rule of Criminal Procedure 48(a), the United States of America hereby moves this Court for leave to dismiss without prejudice all charges against Defendant KHOSROV SHAPOORIAN in cases 1:23-mj-90 and 1:23-po-30.

The Probation Office has advised the parties that Mr. Shapoorian has remained compliant with the conditions of his pre-trial release and supervision. In addition, the defendant has not returned to the CIA since the defendant began pre-trial supervision. This fulfills the requirements of the parties' alternative disposition plan, as described in the July 28, 2023, joint status report. *See* ECF No. 15 (1:23-mj-90) & ECF No. 8 (1:23-po-30).

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Therefore, the United States submits that dismissal without prejudice of both cases (1:23-mj-90 and 1:23-po-30) is in the interest of justice.

Respectfully submitted,

Jessica D. Aber
United States Attorney

Date: September 18, 2023

By: /s/
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CERTIFICATE OF SERVICE

I hereby certify that on September 18, 2023, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to all counsel of record.

_____/s/_____
Cameron M. Etchart
Special Assistant United States Attorney